ARNOLD PORTER KAYE SCHOLER

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January 30, 2017

VIA ECFS

Marlene H. Dortch, Esq. Secretary Federal Communications Commission 445 Twelfth Street, SW Washington, D.C. 20554

Applications of AT&T Inc. and DIRECTV for Consent To Assign or Transfer Control of Licenses and Authorizations, MB Docket No. 14-90

REDACTED—FOR PUBLIC INSPECTION

Dear Ms. Dortch:

Re:

Pursuant to the *Second Amended Modified Joint Protective Order*, Appendix B of the Commission's Memorandum Opinion and Order ("Appendix B"), and the methodology for the reporting of internet interconnection performance metrics developed by the Independent Measurement Expert ("Methodology") in the above-referenced proceeding, AT&T Inc. (together with its subsidiaries and affiliates, "AT&T") is submitting one copy of a CD-ROM containing the *unredacted* Highly Confidential Report on Internet Interconnection Performance Metrics for the period of December 10, 2016 to December 31, 2016 (December 2016 Report").²

Applications of AT&T Inc. and DIRECTV for Consent To Assign or Transfer Control of Licenses and Authorizations, MB Dkt No. 14-90, Second Amended Modified Joint Protective Order, DA 14-1640 (MB rel. Nov. 12, 2014); Applications of AT&T Inc. and DIRECTV for Consent To Assign or Transfer Control of Licenses and Authorizations, Memorandum Opinion and Order, FCC 15-94, App. B §§ V, VII.5 (rel. July 28, 2015); First Amended Report of AT&T Independent Measurement Expert: Reporting Requirements and Measurement Methods, dated June 28, 2016, MB Dkt No. 14-90 (filed Aug. 4, 2016).

The Commission approved the Methodology on August 12, 2016. Public Notice, *Internet Interconnection Performance Measurement Methodology Adopted in Accordance with AT&T-DIRECTV Merger Condition*, DA 16-909 (rel. Aug. 12, 2016). AT&T began implementing the Methodology on December 10, 2016, within the 120 days required by the condition. *See* App. B § V.2.c.(v). This first period of reporting is for the partial month of December, which will allow the reporting timetable for subsequent reports to run from the start to finish of each calendar

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For this reporting period, AT&T did not receive data from any interconnecting party, pursuant to paragraph 11 of the Methodology.

AT&T hereby requests Highly Confidential treatment of this submission. Separately, AT&T is submitting a redacted public version of this filing via ECFS and unredacted copies to the Commission Staff.

Please contact me at (202) 942-6608 or Maureen.Jeffreys@aporter.com if you have any questions. Thank you for your assistance.

Respectfully submitted,

Maureen R. Jeffreys Counsel for AT&T Inc.

Enclosure (Withheld as Highly Confidential)

cc (via email): Jim Bird, Esq.

Neil Dellar, Esq. Jeffrey Gee, Esq. Michael Ray, Esq.

Donald K. Stern, Esq., Independent Compliance Officer

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